



October 10, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Cleveland Play House and Playhouse Square (the country's largest performing arts center outside of New York City), located in Cleveland, Ohio, that draws more than 1 million people annually to its 10 performance spaces and education programs to approximately 26,290 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Our mission is to inspire, stimulate, and entertain diverse audiences across Northeast Ohio by producing plays and theatre education programs of the highest professional standards. We value theatre as essential throughout one's life for developing empathy, broadening understanding, and heightening awareness of the communal nature of our existence. Our educational programming is a critical component in creating meaningful artistic connections among children, youth, and adults. CPH recognizes that rich relationships among artists, staff members, board members, and the community are the very essence of a premier American regional theatre. As such, CPH strives to connect the community with its work, and its work with the community, through programs that foster civic dialogue, fuel intellectual curiosity, and welcome new audiences to the theatre.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant

public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

In our facilities we use a variety of wireless devices. At CPH we regularly rent upwards of 20 wireless microphones for our musicals. We also use wireless IEM monitors for musicians and sound effects. All of these devices are limited to the range of the UHF band. Our lighting systems regularly use wireless dimmers in the 2.4 GHz band, as well as our wireless headsets in the 5 GHz band. Playhouse Square, our partner, has 10 theaters in its complex (of which we use three) and they regularly host Broadway tours in their many theaters. With the current limited frequency, we have had to carefully coordinate as many as 60 wireless devices between the theaters. Our wireless devices are tunable within the frequency ranges allowed, but this is not an insignificant task.

We at CPH currently rent our wireless, usually digital wireless for a narrower band width, but most touring companies come with their own wireless and must use the frequencies that come with their devices. In the past we owned wireless, but we had to throw away a third of it when we lost the 700 MHz range due to it being auctioned off. Our others were not replaced when age caught up with them, due to the uncertainty of the FCC's handling of the remaining frequency ranges. As we rent, we have some small ability to request frequency ranges that will help mitigate the crosstalk issue we have with a 10 theater complex, but it isn't always successful.

Our staff at Cleveland Play House consists of one fulltime Audio Supervisor, a graduate of the Yale School of Drama and who has worked with audio and wireless for the past 30 years, and a sound board operator who has worked in the professional audio field for the past 5 years. Playhouse Square has IATSE sound board operators for each theater and a production manager that supervises them. Each Broadway tour has IATSE audio professionals who travel with the production.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I appreciate that the Commission has sought Public Comment on this very important issue. Performing arts organizations and educational institutions contribute so much to the communities that they serve and most struggle financially. We strive to produce the highest quality of work for our audiences but are challenged because of the restrictions on wireless frequencies. It is more economical to purchase new wireless microphones as opposed to renting, but we are hesitant to do so because of the uncertainty with the FCC rulings. If the proposal to expand Part 74 LPAS is approved, we would have the insurance needed to invest in a new wireless microphone package. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless

microphones. The proposal is a much-needed solution that benefits the arts community and the public.

Sincerely,

A handwritten signature in black ink, appearing to be 'Kevin Moore', with a long horizontal flourish extending to the right.

Kevin Moore